

**To:** Seter, David[Seter.David@epa.gov]  
**From:** Jeryl Gardner  
**Sent:** Wed 12/13/2017 12:23:43 AM  
**Subject:** RE: EPA Review Anaconda OU3 Draft HHRA Work Plan

Hi Dave,

Of the times you suggested below, I am available for all but one.

I'm available:

Thu, 12/28, 1-3;

Thu, 1/4: 9-11;

Tue, 1/9: 1-3; and,

Thu, 1/11: 1-3

Who do you think should be included in this initial comment clarification call?

Thanks,

Jeryl R. Gardner, P.E., C.E.M.

Supervisor, Abandoned Mine Lands Branch

Bureau of Corrective Actions, NDEP  
901 S. Stewart St., Ste 4001  
Carson City, NV 89701  
775-687-9484  
[jgardner@ndep.nv.gov](mailto:jgardner@ndep.nv.gov)



**From:** Seter, David [mailto:Seter.David@epa.gov]  
**Sent:** Tuesday, December 12, 2017 4:14 PM  
**To:** Jeryl Gardner <JGARDNER@ndep.nv.gov>  
**Subject:** FW: EPA Review Anaconda OU3 Draft HHRA Work Plan

Jeryl,

Sophia is not available next week, so can you please let me know if any of the following times work for you for a discussion with ARC:

Thursday Dec 28 between 1 PM and 3 PM

Thursday Jan 4 between 9 AM and 11 AM

Tuesday Jan 9 between 9 AM and 11 AM

Tuesday Jan 9 between 1 PM and 3 PM

Thursday Jan 11 between 1 PM and 3 PM

Thanks,

David A. Seter, P.E.

Remedial Project Manager

USEPA Region 9

Superfund Division (SFD-8-2)

75 Hawthorne Street

San Francisco, CA 94105

415-972-3250

**From:** Oman, Jack [<mailto:Jack.Oman@bp.com>]  
**Sent:** Tuesday, December 12, 2017 9:37 AM  
**To:** Seter, David <[Seter.David@epa.gov](mailto:Seter.David@epa.gov)>  
**Cc:** 'Davis, David' ([drdavis@blm.gov](mailto:drdavis@blm.gov)) <[drdavis@blm.gov](mailto:drdavis@blm.gov)>; Jeryl Gardner <[JGARDNER@ndep.nv.gov](mailto:JGARDNER@ndep.nv.gov)>; John Batchelder <[jbatchelder@envirosolve.com](mailto:jbatchelder@envirosolve.com)>; Alma Feldpausch ([afeldpausch@ramboll.com](mailto:afeldpausch@ramboll.com)) <[afeldpausch@ramboll.com](mailto:afeldpausch@ramboll.com)>  
**Subject:** FW: EPA Review Anaconda OU3 Draft HHRA Work Plan

Dave,

As we discussed on the call today, we would like to schedule a call to discuss your comments. Please advise as to your availability to get together to discuss.

Thanks,

-jack

**From:** Alma Feldpausch [<mailto:afeldpausch@ramboll.com>]  
**Sent:** Monday, December 11, 2017 4:20 PM  
**To:** Oman, Jack; Tull, James ([James.Tull@arcadis.com](mailto:James.Tull@arcadis.com))  
**Cc:** 'Randy Miller'; John Batchelder; Stilwell, Chuck T; Johnson, Brian S; Cohen, Adam  
**Subject:** RE: EPA Review Anaconda OU3 Draft HHRA Work Plan

Jack,

As we discussed, it would be helpful for us to have the opportunity to review and clarify some comments of the comments provided by EPA before revising the draft HHRA work plan. EPA stated in their comments that they are open to further discussion on several topics and in these instances, it would be helpful to gain a clearer understanding of EPA's intent as well as specificity in the requested revision. Due to the request for a revised work plan by February 5, 2018, it will be ideal to schedule a teleconference with EPA as early as next week.

Topics requiring clarification include:

- Confirm that EPA reviewed meeting notes documenting verbal decisions made between ARC and EPA (Chris Dirscherl), as several of EPA's recent comments conflict with agreements

made during calls with EPA. In particular, meeting notes following discussion of Tech Memo #2 memorialize decisions made that would appear to conflict with EPA's initial written comments. Examples include the resolution of comments related to identification of COPCs, consideration of an industrial exposure scenario instead of a residential scenario if/when an environmental covenant/access agreement were signed between SPS and NDEP, use treatment of VLT data, and assumption that 45% of indoor dust is derived from outdoor soil.

- There are several comments made by YPT/EPA that may be the result of misinterpreting the work plan text, or lack of clarity in the work plan text. Ensuring that EPA/YPT and ARC teams are clear on the intent of the comments and existing work plan text before revising would be helpful to avoid further confusion. Examples relate to consideration of hot spots, treatment of duplicate samples, and use of VLT data.
- During the work planning stage, EPA had agreed that a residential scenario would not be relevant if an environmental covenant/access agreement was recorded for SPS-owned property. Since the work plan was submitted last December, deed restrictions were implemented for OU-3, thereby supporting a focus on industrial rather than residential exposure scenarios. This should be confirmed with EPA prior to revising the work plan.

Alma

**Alma Feldpausch**

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\*\* Please note that my work week is generally Monday, Tuesday, Thursday, Friday, with some availability on Wednesdays until 2 pm PST. \*\*

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